



City of
LAWRENCE
Indiana

R05-15-A-092

Dean E. Jessup, Mayor

December 19, 2014

Environmental Management Support, Inc.
Attn: Mrs. Edie Findeis Cromwell
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Dear Mrs. Cromwell:

On behalf of the City of Lawrence, Indiana, I am pleased to submit this application for a U.S. EPA Brownfields Assessment Grant for hazardous substances (\$200K) and petroleum (\$200K) for a total of \$400,000. Lawrence is located in Central Indiana, east of Indianapolis in Marion County.

The City of Lawrence needs the EPA grant funding to combat the impacts brownfields have on the health of residents, the economy, and the natural resources in our community. A preliminary inventory has been developed and over 15 brownfield properties have been identified. Up to an estimated 20-30 sites may be added once the grant funding is awarded. Of these sites, the City, with the help and input of citizens, has identified seven priority sites (Table 2 in Ranking Criteria) disproportionately impacting sensitive populations and with the greatest potential for redevelopment.

The majority of the priority sites are located on or near the Pendleton Pike Corridor. This thoroughfare through our city has been declining for decades and is in need of significant revitalization. Infrastructure has already been put in place and the area is ready for development partners. The EPA assessment funds will provide the initial investment to stimulate action from developers and return this corridor to the prosperity it once enjoyed.

Higher than average unemployment, a decline in available jobs, low wages, loss of tax revenues, and high poverty have strained the economic welfare of the City. Economic decline has not only left citizens without competitive wages but also with potentially contaminated, vacant properties. These properties are magnets to criminal activity as well as a threat to the health of the residents.

Lawrence has suffered decades of impact from brownfields and blight. Recently, the City has acknowledged this and has begun to systematically address these concerns. In response, Lawrence's brownfields program has become a key component in redevelopment. We have already made significant investment in brownfields and hope to continue this effort aggressively. We have also leveraged local and private funding to redevelop properties in our community. Our priorities for the Grant will be to update and

9001 East 59th Street, Suite 301
Lawrence, Indiana 46216
317.545.6191

improve our brownfield inventories and site prioritization, and to continue assessments and cleanup plans for high priority sites.

As requested, please find the following information regarding this grant application:

- a. Application Identification: City of Lawrence, 9001 E. 59th Street, Suite 301, Lawrence, IN 46216
- b. DUNS number: 19-857-1770
- c. Funding Requested:
 - i) Grant Type: Assessment
 - ii) Federal Funds Requested: \$400,000
 - iii) Contamination: Hazardous Substances (\$200,000) & Petroleum (\$200,000)
 - iv) Community-Wide
- d. Location: City of Lawrence, Marion County, IN
- e. N/A
- f. Contacts:
 - i) Project Director: Tim Joyce, Chief of Staff and Director of Economic Development, City of Lawrence, IN, Phone (317) 545-6191, Fax: (317) 549-4830, email: tjoyce@cityoflawrence.org, Mailing address: 9001 E. 59th Street, Suite 301, Lawrence, IN 46216
 - ii) Chief Executive/Highest Ranking Elected Official: Mayor Dean Jessup, City of Lawrence, IN, Phone (317) 545-6191, Fax: (317) 549-4830, email: mayor@cityoflawrence.org, Mailing address: 9001 E. 59th Street, Suite 301, Lawrence, IN 46216
- g. Date Submitted: December 19, 2014
- h. Project Period: Project period will not exceed three years from date of award.
- i. Population:
 - i) 46,001 (2010 U.S. Census)
 - ii) N/A
- j. The Other Factors Checklist is included as an attachment to this cover letter.

The City of Lawrence hopes to be a model and leader in Indiana in the area of brownfield redevelopment. Thanks to our partnership with the EPA, the Indiana Brownfields Program, and many of our citizens, we are making progress toward addressing and resolving our long-standing brownfield issues. This grant is essential to successfully redevelop properties in our community. We look forward to accelerating our extensive program of community engagement with the assistance of the U.S. EPA.

Sincerely,



Dean E. Jessup
Mayor, City of Lawrence

V.B. Ranking Criteria for Assessment Grants

V.B.1. Community Need

V.B.1.a. Targeted Community and Brownfields

V.B.1.a.i. Targeted Community Description: The City of Lawrence (the City) is located in central Indiana, and is a suburb of Indianapolis to the east. The City is located within Marion County and has a population of 46,001 inhabitants and covers 20.24 square miles (U.S. Census 2010). Many residents commute to Indianapolis for work while others work in the industrial and commercial businesses within the City. The City was once the home of Fort Benjamin Harrison (established in 1903) until its closure in 1996. This army post once housed over 4,000 active duty servicemen and women and played a key role in the shaping and development of the community. Because the City had grown up around the base, when it closed, it left a city without a town center and meant the loss of over 1,000 jobs and an annual payroll of \$125M. City's commerce began to cluster south of the post along U.S. Route 36 (Pendleton Pike) which became a charmless strip of used car lots, liquor stores, boarded up gas stations, and pawn shops. Since the base closed, the City and residents have worked to repurpose and reshape the businesses and industry that once relied heavily on the military presence. The Defense Finance and Accounting Service (DFAS) is the only remaining base related employment center after its closure and is the core of the city economy.

The demographics in the City are very unique in that it is like three separate cities, separated by race and income: north Lawrence, central Lawrence, and south Lawrence. North Lawrence residents tend to be more affluent than the rest of the City's residents, where central Lawrence residents are very similar to those of the rest of Indiana with average incomes. South Lawrence, comprised of Census Tracts 3307 & 3308.05 (Pendleton Pike corridor), however, is severely depressed economically. The residents of households near Pendleton Pike contrast greatly with the rest of the City in Median Household Income, Per Capita Income, and Poverty Rate. South Lawrence is also home to a disproportionate number of minorities, children, and low income residents. Not coincidentally, it is where the majority of brownfields are present. South Lawrence is the target community for this grant.

The brownfields targeted for this grant are commercial and/or industrial properties located in low income residential and/or mixed use areas of the target community. Because the community is small, many of these vacant or underutilized brownfield sites impact large portions of the neighborhoods within which they are located and threaten both the physical and financial wellbeing of the community. Due to the depressed economic condition of the target community left in the wake of the base closing, many of the residents in the target community have been unable to find adequate employment opportunities and are unable to move away to improve their condition. Significantly, the majority of the target brownfield sites are located in or near the commercial and industrial district of south Lawrence which have the greatest opportunity for successful redevelopment, bringing jobs & prosperity to the target community, the needs for which are so desperate.

A particularly important need of the target community is affordable, mixed used development/housing as indicated in the Pendleton Pike Development Implementation Program, which details the redevelopment needs of the City. The program stresses the importance of clean, safe, affordable housing; the need to improve the walkability of the community; the desire of citizens for more parks, recreational areas, and greenspace; and the need to transition underutilized real estate to higher performing industrial or commercial uses. Many of the businesses in the target community are in residential areas; however, because of the blight and stigma of area brownfields, residences often remain unoccupied.

The community has made strides to recover from the base closure with aggressive redevelopment efforts centered around the base property itself. Much of the base has been redeveloped into the Fort Harrison State Park and golf course, while other areas have become municipal buildings, housing, retail, and commercial space. However, the recovery has not extended to the target community and the Pendleton Pike Corridor. Franklin Road revitalization as identified in the Pendleton Pike Development Implementation Program is a key component to the target community redevelopment. The City is planning to add bike/pedestrian lanes and trails along the road to connect the heart of the economic base of Lawrence (DFAS) and add mixed commercial/residential properties in an effort to diversify the local economy and connect Pendleton Pike to the 56th Street corridor where DFAS is located. EPA Grant funding will help to kindle an aggressive revitalization effort planned for this area through brownfield redevelopment which will create affordable housing within the target community where necessary shopping, services and employment are readily

available. This is crucial for the target community, which lags behind other portions of the City in post-base closure redevelopment, due in part to the presence of the many nearby brownfields.

V.B.1.a.ii. Demographic Information: The impact of brownfields on the target community is evident in a comparison with the overall welfare of the City, as well as that of the state and nation. Table 1 outlines demographic information about the City and sensitive populations (children, minorities, low income) in the target community.

Table 1 – Demographics and Financial Profile

	Census Tract 3308.05	Census Tract 3307	City of Lawrence	Indiana	National
Population	3,056 ¹	5,933 ¹	46,001 ¹	6,483,802 ¹	308,745,538 ¹
Unemployment	17.2% ^{3*}	10.3% ^{3*}	5.3% ²	5.3% ²	5.5% ²
Poverty Rate	44.9% ³	25.4% ³	14.8% ³	14.7% ³	14.9% ³
Children Below Poverty Level	58.1% ³	36.5% ³	22.8% ³	20.9% ³	20.8% ³
Median Household Income	\$22,948 ³	\$30,100 ³	\$51,424 ³	\$48,372 ³	\$53,046 ³
Per Capita Income	\$12,258 ³	\$14,698 ³	\$24,377 ³	\$24,558 ³	\$28,051 ³
Percent Minority	46.7% ³	21.5% ³	31.2% ³	13.3% ³	23.5% ³
Children < 18	30.7% ¹	26.7% ¹	28.2% ¹	24.8% ¹	24.0% ¹

¹2010 U.S. Census (www.census.gov)

²2008-2012 American Community Survey 5-Year Estimates

³Department of Workforce Development (IDWD)

*Current unemployment data not available at the Census Tract level.

The target community has significantly higher unemployment and poverty rates than state and national figures (Indiana Department of Workforce Development (IDWD)). In addition, the percentage of children below the poverty level is higher than that of state and national figures. According to the U.S. Census 2008-2012 American Community Survey (ACS), over ¼ of children in Census Tract 3308.05 and nearly ½ of children in Census Tract 3307 fall below the poverty level. The percentage of children is also higher than the state and national figures. According to U.S. Census data, the target community has seen income drop significantly in the past few years. In Census Tract 3308.05, the Median Household Income dropped 8% since 2010 and Census Tract 3307 fell 16% in the same period (U.S. Census ACS). While the target community suffered income reductions, Indiana and the national Median Household Income increased 16.7% and 26.3% respectively.

These statistics are exacerbated by the decline in the number of jobs available in the county (over 1,350 jobs lost in 2014 alone). Significant job losses have ballooned the unemployment rate and strained the funds available to the City due to loss of property and income tax revenues brought by blighted, underdeveloped properties, vacant properties, and lower earned income of taxpayers. Unemployment in the City is higher than the state and national average according to the most recent data available (10/14 – IDWD). Brownfields in residential areas decrease property values of homes, often resulting in a lack of neighborhood upkeep and financially secure residents moving out of the neighborhoods. All of these issues add to the economic distress of the City's residents. Low income residents find it more difficult to move away from the shadow of brownfield properties that may be impacting their health and are often unable to obtain adequate health care.

Job losses (e.g. International Paper Company-168 jobs in 2011 & 2013, Aurora Bank FSB-450 jobs in 2012, and Navistar-1,751 in 2009 & 2010) experienced by the target community residents include those from both manufacturing and service industries which have occurred in the last five years. The loss of manufacturing employment has created a "trickle down" effect, resulting in the corresponding loss of smaller, support businesses in the City, and in turn, the closure of other businesses (restaurants, gas stations, retail, etc.) as population growth has reversed. EPA Assessment Grant funding will bring new jobs and stimulate the growth and prosperity that is so desperately needed by the target community and its residents.

V.B.1.a.iii. Brownfields: After seeking input from the local community and stakeholders, the City has developed an initial brownfield inventory with over 15 brownfields identified, and with an additional 20-30 potential brownfield properties to be identified once grant funding has been awarded. These sites include gas stations, auto service garages, machine/repair shops, dry cleaners, railroad corridors, and manufacturing facilities ranging in size from 0.25 to 10 acres. The initial brownfield inventory identifies several priority properties located predominantly in the target community and

presented in Table 2 below:

Table 2 – Priority Brownfield Sites

Brownfield Site	Suspected Contaminants	Nearby Sensitive Populations	Redevelopment Potential
LABSCO (Census Tract 3308.05) <i>Pike Plan Area</i>	Petroleum, asbestos, VOCs, SVOCs, metals	Low income, minorities, children	Eco-friendly industrial development
Coast to Coast Imports (Census Tract 3308.05) <i>Pike Plan Area</i>	Petroleum, VOCs, SVOCs, metals, glycols	Low income, minorities, children	Commercial, light industrial, or mixed use (commercial/residential) development
Pearson Electronics (Census Tract 3308.05) <i>Pike Plan Area</i>	Petroleum, asbestos, VOCs, SVOCs, metals, PCBs	Low income, minorities, children	Light industrial development
Former Bob Rohrman Auto (Census Tract 3308.05) <i>Pike Plan Area</i>	Petroleum, VOCs, SVOCs, glycols, metals, PCBs	Low income, minorities, children	Commercial (potential farmer's market)
Former DMR Laundry (Census Tract 3307)	Petroleum, VOCs, SVOCs	Low income, children	Recreational/greenspace, commercial or mixed use (commercial/residential) development
T&S Construction (Census Tract 3307) <i>Pike Plan Area</i>	SVOCs, metals, herbicides, pesticides	Low income, children	Commercial, light industrial, recreational/greenspace, or mixed use (commercial/residential) development
Former Lawrence High School (Census Tract 3308.05) <i>Pike Plan Area</i>	Petroleum, VOCs, SVOCs, metals, PCBs	Low income, minorities, children	Residential
* damage to the skin, liver, kidneys, heart, spleen, nervous system, respiratory system, hormonal system, blood, and immune system, and may also cause neurological damage, birth defects and cancer			

Brownfields increase crime and blight, while causing declines in health conditions, property values, and tax revenues. The City estimates that 25% of the target communities' properties are blighted and in decline. Without addressing the environmental impediments to these properties, redevelopment of them is very unlikely, and the burdens they place on the residents will remain. In Census Tract 3308.05, home values have dropped over 10% in the past 4 years alone and the median home value in 2013 for Census Tract 3307 is a discouraging \$21,300, falling far below the Indiana (\$122,800) and the national (\$176,700) figures according to the U.S. Census ACS data.

V.B.1.a.iv. Cumulative Environmental Issues: In addition to the priority sites, many other brownfields and active industry adds to the threats faced by the surrounding residents and ecology. In fact, there are thousands of properties within Marion County and hundreds in the City that have environmental records available on the Indiana Department of Environmental Management (IDEM) Virtual File Cabinet. Heavy industry is located throughout Marion County and directly impacts the air, water, and soil quality of the City's residents. Additionally, since the area is heavily urbanized, significant traffic volume and congested roadways create an extremely high amount of vehicle emissions, with potentially negative health effects on residents. According to the American Lung Association's State of the Air 2014 report, Marion County has shown annual increases in airborne particulate matter since 2010 and received an "F grade" for ozone levels in 2014. Marion County is the location of several other environmental issues contributing to the negative health impacts of the City's residents include a power plant, a landfill (one of the largest in the state), a municipal solid waste incinerator, heavy industry, and six National Priority List (NPL) sites. The assemblage of industrial and urban development and environmentally impacted properties creates social and economic challenges on its own, but coupled with the high density of brownfields in the target community, the magnitude of their impact is crushing. Redevelopment of properties near these brownfields is difficult and some potentially viable sites are not even considered for redevelopment because of their proximity to brownfields.

V.B.1.b. Impacts on Targeted Community: The Pendleton Pike corridor has a disproportionately high number of children, minorities, and low income residents (including children below the poverty level) compared to state and national figures. The cumulative environmental impacts of brownfield properties and their proximity to sensitive

populations within the target community result in a potentially disproportionate exposure to environmental pollutants. The list of potential contaminants (VOCs, SVOCs, metals, herbicides, pesticides, etc.) present at the priority sites is extensive, and many are known to cause health problems, including damage to the skin, liver, kidneys, heart, spleen, nervous system, respiratory system, hormonal system, blood, and immune system, and may also cause neurological damage, birth defects and cancer. Exposure to contaminants from brownfields and other industry in the area through groundwater, surface water ambient air, indoor vapors, and surface soils results in significant cumulative environmental conditions, and the dense assemblage of brownfields in the Pendleton Pike area is of greatest potential exposure for residents. According to the Burden of Asthma in Indiana, 2nd Edition (2011), Marion County has the fourth highest number of hospitalizations (21/10,000) for asthma in the state. In addition, according to Indiana State Department of Health (ISDH) 2008 data, infant mortality is significantly higher in Marion County (8.1/1,000) as compared to Indiana (6.9/1,000) as is neonatal mortality (5.0/1,000 vs. 4.4/1,000). Table 3 shows additional key data which clearly indicates the potential for impacts of brownfields on sensitive populations in the City. Health data specific to the City is not available; however, the statistics are believed to be representative of the City.

Table 3 – Disproportionate Health Impacts on Sensitive Populations

	Marion Co.	Indiana	National
Infant Mortality Rate-All Races (per 1,000)	8.1 ¹	6.9 ¹	6.2 ⁴
Infant Mortality Rate-African Americans (per 1,000)	13.8 ¹	14.9 ¹	11.2 ⁴
Neonatal Mortality Rate-All Races (per 1,000)	5.3 ¹	4.4 ¹	4.0 ⁴
Neonatal Mortality Rate-African Americans (per 1,000)	8.6 ¹	9.3 ¹	7.3 ⁴
Percent of Low Birth Weight Infants-All Races	9.4% ¹	8.3% ¹	8.0% ⁴
Percent of Low Birth Weight Infants-African Americans	13.9% ¹	14.2% ¹	12.8% ⁴
Percent of Preterm Births	12.7% ¹	12.4% ¹	11.6% ⁴
Cancer Mortality (per 100,000)	210.0 ²	194.5 ²	184.6 ⁴
Lung Cancer Mortality-All Races (per 100,000)	72.7 ²	62.6 ²	47.6 ⁴
Lung Cancer Mortality- African Americans (per 100,000)	82.1 ²	69.3 ³	51.4 ⁴
Percent Obese Adults	30.0 ⁵	31.0 ⁵	27.8 ⁵

¹Indiana Department of Health – Indiana Maternal and Child Health Outcomes and Performance Measures Data Book – 9/2012, ²Indiana State Dept. of Health Cancer Registry, 2002-2011 data, ³Indiana State Dept. of Health, 2007-2011 data, ⁴Center for Disease Control National Vital Statistics System (www.cdc.gov/nchs), ⁵Indiana Indicators.org

The elevated numbers in these health conditions are likely a result of the poor environmental conditions within which the residents live. The health threats posed by brownfields coupled with the elevated number of health conditions discussed above indicate the potential linkage between the target community's brownfields and the public's health.

All of the priority brownfield sites are located in areas where sensitive populations are potentially at risk. For example, according to the 2010 Census, of the residents living within Census Tract 3308.05 (where six of seven priority sites are located), 46.7% are minorities and 30.7% are children. Moreover, a shocking 58.1% of the children are living below the poverty level (2008-2012 ACS 5-Year Estimates). In Census Tract 3307, nearly 28% of the residents are children. In many cases, the residential properties in the immediate vicinity of priority brownfield sites in the target community have very low property values, a high renter-occupied rate, and low rent. Census Tract 3308.05 has a median gross rent of \$640 compared to Marion County at \$751, Indiana at \$719, and the nation at \$889. It also has an extremely high renter-occupied rate of 76.8% compared to Marion County's 43.1%, Indiana's 29.4%, and the nation's 34.5%. Even more concerning is the median home value in Census Tract 3307. At \$20,200, the home values in this area are many times less than Marion County's (\$120,000), Indiana's (\$123,400), and the nation's (\$181,400). These statistics are indicative of how depressed the areas around the priority brownfield sites are. The residents of the target areas are already struggling with the stresses associated with their economic conditions. Adding pressures brought by living in the midst of brownfields is often overwhelming. Other disproportionate numbers of sensitive populations such as children, impoverished residents, and minorities live, work, and play in the target community. Exposure pathways such as groundwater, indoor vapors, contact with contaminated soils, surface water runoff, and migrating airborne dust make nearby/adjointing brownfields a serious risk of contaminant migration and exposure to already struggling residents.

V.B.1.c. Financial Need

V.B.1.c.i. Economic Conditions: Blighted and declining neighborhoods within which once thriving businesses were located very likely contributed to their eventual failure. This cyclical pattern of decline must be stopped through an aggressive injection of capital. Limited municipal resources make this impossible without EPA funding assistance. Because of the economic challenges including small population size, low income, high poverty rate, unemployment, limited tax base, and falling property tax revenues, the City is unable to fund the investigation and clean-up of the large number of brownfield sites. In addition, legislation passed by the Indiana General Assembly in 2004 imposed caps on levies, and in 2011, the State Constitution imposed caps on property taxes, which greatly reduced tax receipts received by the target community. This makes the need to return brownfield properties to the tax rolls even more critical to increase the local tax base to fund essential services for the City. There is an immediate need to attract new jobs and start economic growth rather than falling deeper into the holds of a low-income housing community and further exacerbating this environmental justice issue.

Households within the target community near Pendleton Pike (Census Tracts 3308.05 and 3307) contrast greatly with the rest of the City. Median Household Income, Per Capita Income, and Poverty Rate statistics are all worse than Indiana and national figures (Table 1). The Pendleton Pike area of the City is also home to a high percentage of low income, minorities, and children compared to the remainder of the City, the state, and the nation. This area is also where many of the City's brownfields are located (Table 2). Regional job losses have increased the income crisis in the City and as a result, residents are unable to improve their economic wellbeing. Marion County residents have lost over 1,350 jobs in the past year alone (IDWD). Home values remain low, rent is far lower than the county, state, and national averages, and the number of rental units is high.

As indicated on the Other Factors Checklist in Attachment V, the City has experienced a series of natural disasters in the past several years. In May 2008, a tornado struck the City damaging numerous structures. Heavy rain caused flooding and hail, and high winds created more damage. In the summer of 2011, drought and excessive heat added pressure to the City's natural resources, and in the summer of 2012, yet another severe drought further damaged an already fragile economy in the City and the region. In January of 2014, a series of large snow storms struck the City grinding commerce to a halt. The snow removal budget for the City was completely expended and as a result, future snow removal further depleted other budgets stretching the financial strain on other areas of community services. Each of these acts of nature warranted state and/or federal disaster declarations. Because of the investments necessary to keep the City operational (snow removal, debris removal, assistance to the elderly, etc.), local government experienced significant economic loss. EPA grant funding will offset some financial losses associated with the economic damage in impacted areas of the City.

Because of these and other fiscal and economic challenges, the City lacks the ability to fund the investigation and clean-up of the large number of brownfield sites. EPA approval for funding will enable the City to fully assess conditions on inventoried and prioritized sites. Moreover, it is anticipated that if awarded this grant, the City will be afforded opportunities to access additional state and federal support including EPA Clean-up Grants, Indiana Brownfield Program/EPA RLF loans, SBA loans, etc. that would provide much needed resources for redevelopment activities.

V.B.1.c.ii. Economic Effects of Brownfields: Residential property values in the target community are drastically lower than state and national averages, and in some areas (Census Tract 3308.05), are declining. The lack of discretionary income has severely restricted the ability of property owners to invest in upgrading or even maintaining their properties. The poor condition of the brownfields in the target community limits the ability for area residential properties to appreciate and adds to the cycle of decay, preventing residents from moving away from the blight because of a lack of home equity and a lack of gainful employment near their homes, depriving them of the opportunity to improve their socioeconomic status. Blight and declining neighborhoods, within which many small businesses were once located, very likely contributed to their eventual failure. The general conditions of the area combined with known and feared environmental issues have made bankers and other lenders unwilling to invest in the area as well. Assessment and cleanup of brownfield properties will likely lead to opportunities for target community residents to improve their income, increase the equity of their homes, and kindle redevelopment and increased property tax revenues on these properties.

EPA Brownfields Assessment Grant funds are needed as the initial investment stake for brownfield properties to not only inform reluctant investors of the properties' environmental conditions, but to help them see and understand

the investment potential of these properties, thereby catalyzing reinvestment in the target community. The City must be aggressive in seeking resources to help kindle redevelopment and turn the declining local economy around. Although some success has been made, assistance through the EPA Brownfields Assessment Grant will provide the City the ability to fully assess conditions on inventoried and prioritized sites, and will trigger a much quicker recovery, helping the City return to prosperity. Because of the urbanization of the area and its dense population, an investment by the EPA in the City will have positive economic impacts to the entire region.

V.B.2. Project Description and Feasibility of Success

V.B.2.a.i. Project Description: The City's vision for the target community as outlined in the Pendleton Pike Development Implementation Program is to return to the prosperity they once realized when an active military base was the center of employment activity in the City. Pendleton Pike is part of a federal highway (U.S. 6) project connecting the City to Indianapolis to the west and near Columbus, Ohio to the east. This connectivity creates a high volume of traffic from which commercial and retail redevelopment will gain great advantage. Proximity to Indianapolis offers the potential for industrial development to support larger employers in Indianapolis. Redevelopment of the Pendleton Pike corridor will make the City a destination for regional residents. With the initial site investigation funding in place through EPA grant funds, the often difficult first step of redevelopment will be funded and the City can put their redevelopment plans into motion. For example, redevelopment of the Bob Rohrman Auto property on Pendleton Pike, a high priority target site indicated in Section V.B.1.a.iii., will remove the stigma associated with environmental contamination. This site could again become a viable asset to the community. Temporary jobs would be created through construction work to improve the property. Discussions are ongoing to redevelop this property as a farmer's market where fresh, locally grown produce and fruit can be purchased. With access to Pendleton Pike and the thousands of cars that travel the road daily, this location would serve the redevelopment concept outlined in the Pendleton Pike Corridor Plan well. A recently completed redevelopment plan entitled the Lawrence Village at the Fort outlines a master planned, sustainable, mixed use community which will include residential, commercial, and retail offerings providing a walkable community providing residents an opportunity to eat, shop, live, and work located near Pendleton Pike. The economic impact expected for this redevelopment will create hundreds of temporary and permanent jobs and bring much needed quality, affordable housing to the area as well as commercial investment.

V.B.2.a.ii. Project Timing: The City will aggressively begin grant related activities immediately upon confirmation that they have been selected for funding. The City will work with the assigned EPA Project Manager to prepare application materials and will complete an EPA approved Work Plan. Once the Work Plan is approved, the City will select a qualified environmental consultant in accordance with federal procurement guidelines. Grant startup tasks will be completed according to the following timeline:

- ~ Before Notice to Proceed from EPA – Environmental Consultant selected and under contract
- ~ 1st Quarter of Grant Period – Quality Assurance Project Plan (QAPP) submitted to EPA for review/approval
- ~ 1st Quarter of Grant Period – Community input requested through public meeting
- ~ Early 2nd Quarter of Grant Period – Brownfield Inventory updated, site prioritization and selection finalized
- ~ Early 2nd Quarter of Grant Period – Eligibility Determinations requested & site access requested
- ~ 2nd Quarter of Grant Period – Phase I ESAs begin
- ~ 3rd Quarter of Grant Period – QAPP approval & Phase II ESAs begin
- ~ 1st, 3rd, 5th, 7th, 9th, & 11th Quarters of Grant Period – Community input requested through public meeting
- ~ End of 11th Quarter of Grant Period – All Phase I ESAs completed
- ~ 30 days before end of Grant Period – All Phase II ESAs completed and final contractor invoices received.

Because delays early in projects have long term, lingering impacts on schedules through the duration of the project, the City will work diligently to assure startup activities are completed according to the schedule above. It is the City's intent to allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the cooperative agreement contract. Lawrence Director of Economic Development, Tim Joyce will manage the grant with the assistance of City Clerk Kathy Walton who will handle the financial aspects of the grant program.

V.B.2.a.iii. Site Selection In an effort to take a comprehensive, phased, and prioritized approach to brownfield redevelopment, the City, with the assistance and support of the public, has made an effort to identify over 15 brownfield sites. The City uses and will continue to use the inventory as a tool to help accomplish redevelopment goals. A public meeting has already been held to inform and involve the community and other stakeholders of the brownfield assessment grant and the planned activities funded by it, and to gather public input on the brownfield assessment grant process. Based on the the public and City representatives' input, an initial list of priority sites was developed.

The existing brownfields inventory will be expanded based on further community input and nominations. A final prioritization of identified brownfield sites will be developed based on: 1) redevelopment potential (e.g. property marketability, redevelopment potential, potential for economic benefit), 2) potential for environmental or human health impact and environmental justice, and 3) community input. Because some identified brownfield sites have been determined to be high priority such as the Bob Rohrman Auto and the former Lawrence High School properties, these sites will also be a factor in prioritization of other sites. In addition, based on EPA and community input, additional criteria may be included in the prioritization process. Once prioritization is complete, the City will aggressively begin assessment activities and develop funding plans for cleanup of properties, if needed, to prepare the sites for redevelopment as quickly as possible.

The City has begun to communicate with representatives of some privately owned priority sites to gain access or to resolve access issues in anticipation of this grant funding as well as non-grant funded environmental assessment activities. Such communication also initiates the process for eventual property transfer and redevelopment. These discussions are ongoing creating a positive dialog between property owners, local government, and impacted citizens. An access agreement, which grants access to private parties for conducting environmental assessments, will be prepared and used for properties where site access is necessary to complete grant activities.

V.B.2.b. Task Description and Budget Table: As indicated in Table 4, the City will allocate \$353,000 of the total \$400,000 to Phase I ESAs (typically \$2,500-3,500 each) and Phase II ESAs (typically \$25,000-45,000 each). This equates to 88% of the total grant funding assigned directly to environmental site assessments, maximizing the redevelopment benefit for the City and leverage future investment. With investigation funding in place, the City can begin to leverage other resources to complete the redevelopment of the priority brownfields.

Table 4 – Budget

HAZARDOUS SUBSTANCES							
Budget Categories (programmatic costs only)	Task 1 Program Management & Training Support	Task 2 Brownfields Inventory & Prioritization	Task 3 Phase I ESAs	Task 4 Phase II ESAs	Task 5 Clean-up Planning & Health Monitoring	Task 6 Community Outreach & Involvement	Budget Category Total
Personnel							
Fringe Benefits							
Travel	\$1,500						\$1,500
Equipment							
Supplies	\$250					\$250	\$500
Contractual*	\$2,000	\$5,000	\$25,000	\$151,500	\$12,000	\$2,500	\$198,000
Total (Haz)	\$3,750	\$5,000	\$25,000	\$151,500	\$12,000	\$2,750	\$200,000
PETROLEUM PRODUCTS							
Budget Categories (programmatic costs only)	Task 1 Program Management & Training Support	Task 2 Brownfields Inventory & Prioritization	Task 3 Phase I ESAs	Task 4 Phase II ESAs	Task 5 Clean-up Planning & Health Monitoring	Task 6 Community Outreach & Involvement	Budget Category Total
Personnel							

Fringe Benefits							
Travel	\$1,500						\$1,500
Equipment							
Supplies	\$250					\$250	\$500
Contractual*	\$2,000	\$5,000	\$25,000	\$151,500	\$12,000	\$2,500	\$198,000
Total (Pet)	\$3,750	\$5,000	\$25,000	\$151,500	\$12,000	\$2,750	\$200,000

*In accordance with federal procurement guidelines (40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48), the City will follow its municipal process, compliant with Indiana Code (IC 5-16-11.1 and IC 36-1-12) for bidding/awarding contracts.

*Based upon estimates from *Birch Center Associates, LLC*, a qualified Indiana environmental consulting firm.

Task 1: Program Management & Training Support- \$7,500 – A total of \$3,000 (\$1,500 each for hazardous substances and petroleum) in expenses is estimated for travel to regional and national meetings for periodic training and program management assistance and will be funded by this portion of Task 1. In addition, a total of \$500 (\$250 each for hazardous substances and petroleum) in supplies for support materials needed (such as office supplies and printing related to community outreach materials) has been allocated to this portion of Task 1. The City and its consultant will need to call, meet, and correspond with US EPA staff to manage the grant's cooperative agreement. For this, \$4,000 (\$2,000 each for hazardous substances and petroleum), or approximately 52 hours over three years at an estimated \$77/hr, has been allocated to contractual for this portion of Task 1. In addition, existing funds supporting City and consultant staff time will be used for this task per the Ability to Leverage section below.

Task 2: Brownfields Inventory & Prioritization – \$10,000 (\$5,000 each for hazardous substances and petroleum) – The City will use the funds allocated in this task to update their brownfield inventory. An initial public meeting will be held in the first six months of the grant period to gain public input on properties which may need to be added to the inventory and to help prioritize the inventoried sites. The City's redevelopment plans may be updated based on the findings of the revised inventory outlining priority ranking criteria, cleanup options and strategies, and end-use options for those brownfield sites. Existing funds supporting City and consultant time will be used to cover the costs associated with site eligibility determinations per the Ability to Leverage section below.

Task 3: Phase I Environmental Site Assessments (ESAs) – \$50,000 (\$25,000 each for hazardous substances and petroleum) – The City will contract Phase I Environmental Site Assessment (ESA) activities on key sites throughout the community. All Phase I ESAs will be conducted in accordance with the ASTM standard for Phase I ESAs (E1527-13) and the All Appropriate Inquiry (AAI) rule. It is estimated that the costs for completing Phase I ESAs will range from \$2,500 to \$3,500 per site depending on site complexity. The estimated outputs from Task 3 will include seven to ten Phase I ESAs on hazardous substance sites and seven to ten Phase I ESAs on petroleum sites. Areas of focus will include those already prioritized in the existing inventory (Section VB.1.a.iii.).

Task 4: QAPP/Phase II ESAs /Site Investigations/Geophysical Surveys – \$303,000 (\$151,500 each for hazardous substances and petroleum) – The City will contract for approved work plans, field activities, and reports that will be reviewed by the EPA Project Manager and the Indiana Brownfields Program or the IDEM Voluntary Remediation Program staff consistent with the IDEM Remediation Closure Guide (RCG), as appropriate. These activities may include geophysical surveys to locate buried tanks, initial Phase II ESAs, and delineation of soil and ground water contamination. It is estimated that costs for completing Phase II ESAs will range from \$25,000 to \$15,000 per investigation depending on site complexity and the environmental conditions identified in the preceding Phase I ESAs. The estimated outputs for Task 4 will include four to six Phase II ESAs on hazardous substance sites and four to six on petroleum sites.

Task 5: Clean-up Planning & Health Monitoring – \$24,000 (\$12,000 each for hazardous substances and petroleum) – The City will commit funds from this task to complete three to five Analysis of Brownfield Cleanup Alternatives and Remedial Action Plans associated with sites assessed and ready for remediation. Many contaminated sites pose a potential risk to neighbors through various exposure pathways. For sites with confirmed contamination, an assessment of the impact to human health may also be conducted for neighboring properties and/or properties nearby that are on ground water wells. If vapor intrusion is determined to be a concern, the indoor air, sub-slab, and soil gas of neighboring properties may be sampled to measure the presence of dangerous vapors. In addition, existing funds supporting local health department staff time will be used for this task per the Ability to Leverage section below.

Task 6: Community Outreach & Involvement – \$5,500 (\$2,750 each for hazardous substances and petroleum) – Involvement of key stakeholders (residents and business owners near brownfields, investors, brownfield site owners) and the general public is integral for a successful brownfield redevelopment program. Lake Station will use funds allocated in this task to facilitate community outreach and involvement. The associated costs will fund coordinating/conducting community outreach programs and meetings as well as the costs to prepare, print, and mail project and site information and marketing documents. These tasks will provide information and take input on the plans and progress of brownfield investigation and cleanup planning activities to the general public as well as marketing sites for future development. The City will hold a minimum of six public meetings throughout the grant period to update the community on the brownfield assessment progress and to seek public input and involvement.

V.B.2.c. Ability to Leverage: The City has access to many different funding sources from the local, state, and federal levels in addition to the private sector. The City will provide in-kind items and services such as staff time, meeting facilities, educational materials, social media updates, public notices, public meetings, and other activities. The City will also provide some in-kind staff time and resources to complete all needed programmatic management of the grant funding. This includes all ACRES submissions, quarterly reporting, grant budget tracking, and various other submissions. It is estimated that the City will provide approximately 200 hours of staff time at an average \$40/hr which is an estimated \$8,000 in in-kind services. The environmental consultant will also be expected to provide in-kind services valued at \$4,000 for assisting with ACRES submissions, quarterly reporting, and coordinating/implementing public meetings with stakeholders (including the general public, government representatives, chamber of commerce, redevelopment authorities, economic development authorities, etc.).

The City has a history of leveraging investment in projects throughout the community (Table 6). For example, the City recently leveraged \$600,000 in grant funding to make significant sewer system improvements. In fact, over 66% of the entire project was leveraged from outside funding sources. In all, the City has leveraged over millions in grant funding to improve streets, sidewalks, greenways, and other infrastructure projects over the past five years to help revitalize the community. These projects are indicative of how the City is able to use non-local funds to stimulate redevelopment. Adding EPA Assessment Grant funding will add to this leveraging effort to further revitalize the community.

One of the priority properties currently has a firm leveraging commitment to complete the planned redevelopment. The former Lawrence High School already has investment from a redeveloper to transform the property into an affordable senior housing development. Documentation indicating this leveraging resource is included in Attachment IV and noted on the Other Factors Checklist.

As properties are assessed, the City will work in partnership with many agencies and entities to fill in funding gaps to ensure the success of brownfield redevelopment projects in the City. A detailed funding plan will be developed for brownfield sites/areas as assessment projects develop. Each site will have a unique funding plan because of their individual status and eligibility. The following are some of the sources of funding that will be pursued to leverage the EPA investment (Attachment IV):

- **Tax Increment Financing (TIF):** Property tax revenue used as a subsidy for redevelopment, infrastructure, and other improvements. Up to \$250,000 in TIF funding pledged by the City (see Attachment IV).
- **Tax Abatements:** Lawrence routinely provide tax abatements to redevelopment projects resulting in private investment and job creation and will, at its discretion, take advantage of this leveraging opportunity on a case by case basis for Brownfield redevelopment projects.
- **Indiana Economic Development Corp. (IEDC):** The IEDC offers tax credits and other incentives to help communities create a climate where pressures from taxes, investment costs, and red tape are lower. The City will pursue assistance from the IEDC to maximize the leverage of each dollar invested in brownfields.
- **Indiana Brownfields Program (IBP):** IBP offers low-interest/partially-forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (RLF), State Revolving Fund (SRF), and other IBP-directed Section 128A funding. RLF funding will be used to remediate highest priority sites investigated through this Assessment Grant. SRF funding is available for qualifying communities through an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites. IBP-directed funding, such as Section 128A, may be used to complete the investigation of sites

identified and partially assessed in this Grant.

- Excess Liability Trust Fund (ELTF): ELTF provides up to \$2M in state insurance funding for investigating and remediating eligible sites with underground storage tanks (USTs). This funding will be used on qualified sites with petroleum contamination.
- Private Funding: Private funding may be used to remediate sites ineligible for state/federal funding. Such sites may need encouragement and redevelopment support from the City to conduct necessary clean-up prior to redevelopment. The City will use all means to encourage private funding for further investigation and remediation, as needed.
- Liability Insurance Funding: Indiana courts have rule that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund the cleanup of environmental damages. The City will make every effort to apply this funding source to all eligible sites. The funding is only limited by insurance policy dollar caps (often \$1-3M). Insurance recovery is not limited to municipally owned properties. This funding strategy has been successfully used as leveraged dollars coupled with EPA assessment funding on two brownfields in Logansport, IN, leveraging \$200,000 in assessment funds to date with an anticipated additional \$1-2M in the future assessment and cleanup funding. This success will continue with the use of EPA Brownfields Assessment Grant funds by aggressively pursuing insurance funding on all applicable properties where contamination is identified. Leveraging evidence for this funding is included in Attachment IV.
- Others: The City will also seek additional funding from the following sources: US Department of Agriculture, Community Development Block Grant, US Economic Development Administration, and US Department of Transportation grants, and new funding opportunities and incentives that become available in the future.

V.B.3. Community Engagement and Partnerships

V.B.3.a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress:

V.B.3.a.i. Community Involvement Plan: A minimum of six public meetings will be held to maintain stakeholder engagement and continue to gather public input on their vision for site selection, assessment needs, cleanup decisions, and redevelopment planning. Each public meeting will be advertised through various local media venues, which may include municipal and partner websites, social media, local papers, radio, etc. to ensure that the whole community has the opportunity to provide input. In addition, the City will leverage its social media platforms, earned media and other low-cost, no-cost or in-kind methods to engage the community. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement events. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted both through the City and the Lawrence Community Development Corporation (identified as a community based organization partner in Table 5 below) to bring awareness of the redevelopment opportunities the priority sites offer. When developers for priority sites are identified, they too will be in attendance at public meetings to describe their plans for redevelopment. Translators will be available to disseminate information in Spanish to ensure all residents the opportunity to participate. The City is prepared to provide other language translators as needed. As stakeholder input is provided, it will be maintained in a database to be used for reference when determining assessment priorities. This effort will ensure that the information provided by those directly impacted by brownfield sites in the target communities will be incorporated into the prioritization and redevelopment process. As appropriate, the City will also take advantage of visioning sessions offered by the Kansas State TAB program to maximize the incorporation of target community input.

V.B.3.a.ii. Communicating Progress: The City understands the importance of communicating the progress of EPA Assessment Grant activities. A communication plan has already been developed and already put into motion. A public meeting was held on December 18, 2014 to communicate with the public and stakeholders about the brownfield assessment grant, inventory, and proposal progress. The Lawrence Redevelopment Commission has also passed a resolution making public their commitment and support for the grant application effort recognizing the need for

aggressive brownfield redevelopment in the community which will be dramatically accelerated with this grant award. Upon notification of the EPA grant award, the City will notify the public through media releases to local radio/TV stations, newspapers, the City website, Facebook, Twitter, and other social media outlets. Taking advantage of multiple media technologies will allow the City to communicate with all age groups and demographics in the target community and provide opportunities for all to be informed of the project progress.

V.B.3.b. Partnerships with Government Agencies: The City has developed partnerships and working relationships with the following government agencies:

V.B.3.b.i. Local/State/Tribal Environmental Authority: The City will work with relevant state regulatory and brownfield program authorities including the following:

- The Indiana Department of Environmental Management (IDEM) – Petroleum Eligibility Determinations, site closure documentation, UST closure documentation, ELTF funding (for LUSTs), guidance & expertise. IDEM has lent their support for the brownfield redevelopment through an acknowledgement letter indicating that Lawrence is a good candidate to receive EPA Assessment Grant funding (see Attachment II).
- Indiana Brownfields Program – Eligibility Determinations (petroleum sites) Site Status Letters, Comfort Letters, interpreting Due Care requirements, grant/loan funds, guidance & expertise, and develop plans to support redevelopment including remediation strategies that integrate site design which will reduce costs.

V.B.3.b.ii. Other Relevant Governmental Partnerships: The City will work with other relevant federal, state, and local governmental agencies including the following:

- Marion County Health Department (MCHD): The City has a strong relationship with the MCHD, and will work directly with them as it relates to health monitoring. MCHD lend their expertise and experience to help identify and verify off-site health threats posed by the contaminated brownfields identified through the grant. With this information, risk evaluations will more easily be completed. The MCHD has a robust Indoor Air Quality Program focusing on reducing exposure to health hazards in homes and businesses by offering a variety of inspection services aimed at identifying and eliminating various contaminants, including asbestos, radon and other indoor air health hazards. The MCHD is also responsible for several programs designed to improve the environmental health and safety of Marion County residents and employees. Environmental Health Specialists sample surface water and ground water to detect threats to environmental health and Hazardous Materials Specialists try to prevent chemical accidents and environmental contamination through inspection and education programs that focus on proper handling, storage, and disposal of hazardous materials. The City will work with the MCHD to take advantage of all these areas of expertise to assist with brownfield redevelopment activities.
- DOT – Provide funding for infrastructure improvements such as surface transportation improvements, bike/pedestrian transportation infrastructure, safety, and accessibility.
- HUD – Provide funding for community planning and development including multifamily housing and single family housing including affordable housing funding.
- EPA – Hazardous substance Eligibility Determinations (hazardous substance sites), assessment grant funds, guidance and expertise
- Marion County Soil and Water Conservation District – Provide leadership in conservation and development of soil, water and related resources; help implement soil/water conservation practices in the the City community
- WorkOne– Subsidiary of the Indiana Dept. of Workforce Development; specializes in developing opportunities for employers and job seekers to improve the region's workforce through job placement assistance, workshops, and training. the City will work with WorkOne to place qualified candidates with companies seeking to fill positions in environmental investigation, remediation, and site redevelopment

All redevelopment plans will be designed to reduce the risk to area residents and provide a safer community.

V.B.3.c. Partnerships with Community Organizations

V.B.3.c.i. Community Organization Description & Goal: Several community based organizations have pledged a supporting role for the City's brownfields program (Table 5).

Table 5 – Community Based Organization Partners

Organization	Description	Supporting Role Pledged
38th & Shadeland Community	Nonprofit community	Brownfields identification & inventory, redevelopment assistance

Improvement Association	advocacy organization	
Fort Harrison Reuse Authority	Nonprofit land reuse authority	Public outreach, brownfields identification & inventory, boards and committee participation
Lawrence Community Dev. Corp.	Nonprofit community development organization	Public outreach, brownfields identification & inventory, input on grant process, boards and committee participation
Community Alliance of the Far Eastside, Inc.	Nonprofit community advocacy organization	Organize neighborhood meetings, public outreach, boards and committee participation
Greater Indianapolis Habitat for Humanity	Local small business	Public outreach, discriminate information about investigation findings to residents, affordable housing construction
Friends of Fort Harrison State Park	Nonprofit nature and cultural preservation organization	Grant program support

This assemblage of community partners is best suited to reach out to Lawrence residents and the target community because of the breadth of their expertise. This group has regional influence and local ties, maximizing the benefits they bring to the project. The City will work with business organizations, government agencies, and community members to develop strategies for assessment, remedial planning, and ultimately, cleanup. Bringing all interested stakeholders together to share information creates the best foundation for successful and sustainable community-based brownfields redevelopment planning. All projects assessed with EPA funds will be entered into the Indiana Department of Environmental Management Voluntary Remediation Program (VRP) or the Indiana Brownfields Program per program guidelines.

V.B.3.c.ii. Letters of Commitment: See letters of commitment in Attachment III.

V.B.4. Project Benefits

V.B.4.a. Health and/or Welfare and Environment

V.B.4.a.i. Health and/or Welfare Benefits: EPA grant funding will play a critical role in meeting the objectives in the Pendleton Pike Development Implementation Plan. As the plan outlines, Pendleton Pike Corridor (target community) brownfields will be addressed, eliminating blighted, underutilized, and unsafe properties, returning them to active and sustainable reuse. This grant effort will eliminate the environment for criminal activities, blight, and decline typically found on brownfield sites, and replace it with greenspace (DMR Laundry, T&S Construction), locations for healthy food options (Bob Rohman Auto), eco-friendly industrial development (LABSCO), and affordable housing (Coast to Coast Imports, DMR Laundry) which will help sustain, clean up, and restore the City and the ecological systems that support it by providing funds to assess brownfield sites. As redevelopment progresses, blight will be eliminated and property values will rise. Potential contaminants present on brownfield sites within the target community will be identified and delineated, and the most viable methods for remediation will be determined, thereby reducing or eliminating impacts to the target community health and welfare. Companies that once avoided pursuing new business ventures within the target community will invest in new infrastructure providing job opportunities during construction, increased long-term employment opportunities to target community residents, and increased tax revenue. As the seeds of redevelopment are sown, a new sense of civic pride will emerge whereby target community property owners have the financial means and desire to make improvements to their homes, businesses, and the community as a whole. The investigation and remediation of brownfield properties will reduce the impact that contaminants have on sensitive populations such as low income residents, minorities, and children. After a site has been remediated, residents will no longer be at risk from direct exposure to impacted soils, vapor intrusion, and/or friable asbestos. This reduction in exposure will help to lower incidences of disorders of the liver, kidney, nervous system, respiratory system, hormonal system, enzyme system, immune system and blood, as well as birth complications – all of which are exacerbated by direct exposure to contaminants known or believed to be present on brownfield sites in Lawrence. To maximize the health benefits afforded to the target communities' residents, the the City may contact the Agency for Toxic Substances & Disease Registry (ATSDR) for technical assistance and resources to support public health assessments and other studies to prevent exposures and disease related to toxic substances.

V.B.4.a.ii. Environmental Benefits: Potential groundwater and soil impacted by hazardous substances and petroleum in the target community pose a threat to the ecological stability of local bodies of water, such as Geist Reservoir, Field Creek, Indian Lake, Schoen Creek, Fall Creek, Bells Run, and other smaller lakes/tributaries, and groundwater potentially impacted by contaminants migrating from brownfield properties. Each of the priority sites in the City are located upgradient from these ecologically sensitive receptors.

Measures will be taken to protect sensitive populations and ecological receptors in the target community from contaminants during assessment work conducted at brownfield sites. Investigation derived waste will be drummed and removed from the site for disposal at a qualified disposal facility. During the investigation activities, an exclusion zone will be established to prevent the general public from entering areas where danger from exposure and/or construction activities is present. If fugitive dust becomes a concern, measures will be taken to reduce the risk and eliminate dust migration from the subject properties during investigation activities. Erosion control measures will be used to prevent erosion of contaminated soils unearthed during investigations and assure the soils are not carried from the subject site onto adjoining public or private properties, or into local waterways. These activities and others outlined here align with the Livability and Equitable Development Principles by supporting existing communities through the protection of sensitive populations, enhancing economic competitiveness and valuing communities and neighborhoods.

V.B.4.b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

V.B.4.b.i. Planning, Policies, and Other Tools: Many target areas consist of old commercial and industrial sites in the midst of an urban setting. The City is prepared to invest in the targeted redevelopment areas to re-use and modernize infrastructure supplying redeveloped brownfield sites with the necessary infrastructure and providing the sites with sustainable redevelopment potential. Opportunities exist to create modern eco-friendly commercial/industrial and residential developments, particularly in the area of Pendleton Pike. The City has already made significant investments in brownfield redevelopment. The City recently funded environmental investigations for a property on Pendleton Pike that was a former gas station and the adjoining former machine shop. As a result of this environmental investigation investment by the City, a new development is pending which will reduce blight, bring both temporary and permanent jobs to the area, and will increase the tax base. When Fort Benjamin Harrison Army Base closed in 1991, the City, along with the Fort Harrison Reuse Authority, developed a plan to address economic concerns following the exodus of hundreds of army and civilian personnel. At the time of closure, dilapidated buildings and contaminated soils resulted in a significant land value reduction. Investments in infrastructure and remediation were completed and now, the project sets the stage for the development of Lawrence Village at the Fort, a master planned, sustainable, mixed use community which will include residential, commercial and retail offerings. Lawrence Village at the Fort is a destination – a walkable community for residents and visitors to eat, shop, live and work. The City will make efforts to continue to incorporate green remediation, sustainable reuse, and environmental stewardship by incorporating green building and infrastructure practice expectations and goals in bid specifications for publicly funded projects. All of the planned infrastructure reuse described above will reduce greenhouse gases and improve the City's impact on climate change. A partnership with the EPA and the City through the award of this grant is a critical step toward future green infrastructure investment by both the public and private sectors.

V.B.4.b.ii. Integrating Equitable Development or Livability Principles: The City's goals outlined in the Pendleton Pike Development Implementation Program are summarized below and include the following outputs/outcomes:

Creating affordable housing and mixed commercial/residential development: Assessment and redevelopment of brownfields supports the improvement and creation of affordable housing and commercial/residential mixed use development. This will create more community vibrancy, stimulate economic growth, reduce urban sprawl, and improve employment and affordable housing opportunities for target community residents.

Improve the walkability of the community and create recreation areas and greenspace: Brownfield redevelopment will help the City reach their goal of further developing a network of walking/ biking trails, recreational areas, and greenspace throughout the community and to help develop more recreational and transportation opportunities for residents. Economic growth will be stimulated through linkage of residential areas to a revitalized Pendleton Pike, public transportation hubs, and other community amenities via new trails, sidewalks, and greenspace. Improving environmental conditions of natural resources through trail, and greenspace redevelopment will increase property values, enhance alternative transportation options, encourage physical fitness of residents (reduce obesity and improve cardiovascular health), and create a sustainable, green infrastructure for future generations.

Transition under-utilized real estate to higher performing industrial or commercial uses: The assessment of sites in Table 2 will result in the redevelopment of facilities with existing infrastructure in the community which will reduce urban sprawl in greenfields at the outskirts of the City. Redevelopment will leverage other incentives (e.g. tax abatements) which will help create jobs and improve quality of life for residents through increased wages, and create an appealing and

welcoming entrance to the City from interstate traffic. Positive, sustainable end-uses after redevelopment will prevent pollution and reduce consumption. This urban redevelopment will help Lawrence to realize the vision of bringing back the vibrant Pendleton Pike corridor it once had.

Each of the outcomes listed above directly link the City's brownfield redevelopment goals to the HUD-DOT-EPA's goals to incorporate Livability Principles and Sustainable Communities ideologies. Specifically, these outcomes will ensure that the City's brownfields are cleaned up and reused in ways that contribute to greener and healthier homes, buildings, and neighborhoods; mitigate environmental conditions through effective strategies which address solid and hazardous waste, and improve air and water quality; improve residents' access to greenspace, recreational property, alternative transportation, and healthy and affordable food; improve employment and provide affordable housing opportunities for local residents; reduce toxicity, illegal dumping, and blighted vacant parcels; and retain residents who have historically lived within areas affected by brownfields. The properties identified in this application represent prime examples of properties that can make this brownfield redevelopment strategy a success. The City's local initiatives, coupled with the assistance of the Indiana Brownfields Program and EPA, will enable the City to eliminate multi-decade property development barriers so that new private sector economic investment and job creation can be fostered.

V.B.4.c. Economic and Community Benefits (long term benefits):

V.B.4.c.i. Economic or Non-Economic Benefits: End-use redevelopment of brownfields will realize an expanded tax base for the City. Through increased investment, jobs will be created, new residential units will be constructed and property values will be enhanced. According to the Northeast-Midwest Institute (2008), public investment plays a vital role in local economic benefits. Results of the study show that every \$1.00 of public funds invested leverages \$8.00 in total investment. In addition, the study concluded that for every one (1) acre of redeveloped brownfields used, 4.5 acres of greenfields are preserved, lowering the cost of development and infrastructure. A partnership between the City and the EPA through this grant would allow the City to grow the local economy through such a return on investment. Tax revenues generated on properties adjoining and near redeveloped sites would be increased and new jobs would yield even more tax revenues. As brownfields are redeveloped, the "trickle down" seen in job, employment and revenue loss previously discussed (see V.B.1.b.i) through the loss of smaller, support facilities, restaurants, retailers and others, will be reversed and economic growth will multiply in the community. The leveraging of these additional dollars will be made possible by the EPA Assessment Grant.

As a part of the redevelopment design, the City has a plan to add multi-use trails to improve the "walkability" in the City. Some trails are already complete, and plans are in place to develop more as brownfields are investigated and remediated (if needed). These trails will not only serve recreational purposes, but will be linked to the existing trail network where possible, facilitating pedestrian and bicycle traffic travel throughout the community. Other planned redevelopment in the community will include significant greenspace improvement.

V.B.4.c.ii. Job Creation Potential: Partnerships with Workforce Development Programs: When appropriate, the City will work with Ivy Tech Community College and their School of Applied Science & Engineering Technology located in nearby Indianapolis. The school is designed to prepare students for direct entry into the workforce, often in positions directly and/or indirectly related to brownfield redevelopment. This partnership will provide a direct link between trained environmental professionals and the community. As discussed in Section V.B.3.b., the City will work with WorkOne to develop opportunities for employers and job seekers to improve the region's workforce through job placement assistance in environmental investigation, remediation, and site redevelopment. Finally, the City will make every effort to enter into contracts with local contractors and service providers.

V.B.5. Programmatic Capability and Past Performance

V.B.5.a. Programmatic Capability: The City has designated Tim Joyce, Mayor's Chief of Staff and Director of Economic Development as the Grant Project Manager. Mr. Joyce works closely with the City and surrounding governmental and quasi-governmental organizations and been involved in the coordination of brownfield redevelopment projects since he began working for the City in 2012. Mr. Joyce's entire career has involved leadership roles and management duties. As Indiana Gov. Frank O'Bannon's chief of staff, Joyce was essentially the chief operating officer for the state of Indiana, a position in which he oversaw, administered, corrected, implemented, intervened, consulted and counseled. Joyce was the Governor's point person on virtually every issue and initiative, including the state's \$25 billion budget. He is reprising his role as Chief of Staff to Lawrence Mayor Dean Jessup. His other leadership

roles have required him to, among other things, manage grants of many millions of dollars. In all, Mr. Joyce has over 30 years of experience in government administration and working with/managing grants. Mr. Joyce, assisted by City Clerk Kathy Walton and Public Works Director Bruce Northern will work with the EPA, Indiana Brownfields program, and a qualified environmental consultant to ensure that grant funds will successfully expended in a timely fashion and will complete all technical, administrative, and financial requirements of the grant. City leaders have the authority to negotiate access agreements and perform the follow-on steps of redevelopment plans, such as community and regional planning. City staff has experience managing and overseeing assessment activities carried out by qualified environmental consultants and engineers and public outreach specialists. City staff has a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants when appropriate. The City will retain consulting support in accordance with all applicable regulations in order to carry out contractual requirements under this grant. The selected consultant will be required to provide support to successfully and efficiently complete all grant tasks including but not limited to program management, public meeting facilitation, public outreach, brownfield inventory and prioritization, environmental investigation, coordination with government entities and community based organizations, cleanup planning, health monitoring, and the identification of funding needed to complete redevelopment. In the event that Mr. Joyce is unable to complete the duties of managing this agreement, Mr. Bruce Northern, Public Works Director, will take the lead of grant management for the City.

V.B.5.b. Audit Findings: The City has an excellent record of managing federal grants. They have neither received an adverse audit for the use of federal grants nor has there been the need to comply with special “high risk” terms.

V.B.5.c. Past Performance and Accomplishments: Although the City has not received EPA Brownfields funding, they have received other federal and non-federal funded assistance agreements. Table 6 outlines a partial list of the assistance agreements used by City to develop and complete community-wide infrastructure projects.

Table 6 – Past Federally/Non-Federally Funded Assistance Agreements

Funding Source	Project	\$ Funding Received	Outputs & Outcomes
Indiana Dept. of Trans. – Trans. Enhancement	Walking/biking trails in City	\$295,000	Improve walkability of City, reduce vehicular traffic/idling/vehicle emissions, create recreation options & safe paths for residents, improve resident health
Recreational Trails Grant Program	Walking/biking trails in City	\$150,000	Improve walkability of City, reduce vehicular traffic/idling/vehicle emissions, create recreation options for residents, improve resident health
Community Development Block Grant	Sanitary Sewer System Rehabilitation	\$600,000	Reduce sewage overflow and backups, modernize infrastructure
U.S. Dept. of Energy – Energy Efficiency & Conservation Block Grant	Energy efficiency evaluations and upgrades to City facilities	\$130,000	Install energy efficient lighting, HVAC, and insulation in municipal building to reduce energy consumption/save costs
U.S. Dept. of Trans. – Safe Routes to School	Sidewalk & street crossing improvements	\$251,000	Improve walkability of City, reduce vehicular traffic/idling/vehicle emissions, create safe pedestrian paths for residents, improve resident health

The City successfully managed all project agreements including meeting and complying with local, state and federal reporting requirements, terms and conditions, the submission of final acceptable technical reports, and progress reporting throughout the duration of these agreements. No corrective measures were identified for any of the above listed agreements. There were no adverse findings from the granting sources of these agreements, and each project was successfully managed to maximize the leveraging, outputs, and outcomes of the projects which included improved walkability of the City, safer pedestrian traffic routes, reduction of sewage discharges into local waterways, improved regional environmental quality, and safer recreational opportunities.

V.C. Other Factors: The City meets several criteria listed in the Other Factors Checklist. See the checklist attached to the cover letter and included in Attachment V.

Appendix 3 Assessment Other Factors Checklist

Name of Applicant: CITY OF LAWRENCE, INDIANA

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less.	
	Federally recognized Indian tribe.	
	United States territory.	
	Applicant will assist a Tribe or territory.	
	Targeted brownfield sites are impacted by mine-scarred land.	
	Targeted brownfield sites are contaminated with controlled substances.	
X	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.	5
X	Project is primarily focusing on Phase II assessments.	7, 8
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	9, 10
	Community experienced manufacturing plant/power plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant/power plant closures due to bankruptcy or economic disruptions.	
	Recent (2008 or later) significant economic disruption (<u>unrelated</u> to a natural disaster or manufacturing/auto plant/power plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is one of the 12 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties. A core partner/implementation strategy party is a local partner organization/jurisdiction that will carry out the proposed strategy, as demonstrated in letters of commitment or memoranda of understanding which documents their contributions, roles, and responsibilities to the partnership. EDA may provide to	

	EPA a list of the core partners/implementation strategy parties for each of the 12 “manufacturing community” designees, which EPA would use to verify this other factor.	
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	Applicant is a HUD Promise Zone community. To be considered, applicant must attach documentation.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

ATTACHMENTS

- I) Threshold Documentation
- II) State Acknowledgement Letter
- III) Letters of Support from Partners, County Health Department, and WorkOne
- IV) Firm Leveraging Commitments
- V) Other Factors Checklist (also attached to Cover Letter)

ATTACHMENT I)

Threshold Documentation

III.C. Threshold Criteria for Assessment Grants

III.C.1 Applicant Eligibility

The City of Lawrence, Indiana is a General Purpose Unit of Government as defined under 40 CFR Part 31 and is a political subdivision of the State of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.C.2 Letter from the State Environmental Authority

A letter of acknowledgment from the Indiana Department of Environmental Management (IDEM) is included with this application (see Attachment II)

III.C.3 Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. Lawrence will utilize social media platforms, earned media and other low-cost, no-cost or in-kind methods to engage the community, solicit public and stakeholder participation, and advertise public meetings. Regular public meetings have already been and will continue to be held to engage the public and encourage stakeholder and residents' participation in the EPA grant funded Brownfield activities. See section V.B.3 in Ranking Criteria for further information.

III.C.4 Site Eligibility and Property Ownership Eligibility

This criterion is not applicable for a Community-Wide Brownfields Assessment Grant application.

ATTACHMENT II)

State Acknowledgement Letter



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

December 19, 2014

Mr. Tim Joyce
Economic Development Director
City of Lawrence
91 E. 59th Street, Suite 301
Lawrence, Indiana 46216

Re: U.S. EPA Brownfields Grant Proposal
IDEM Acknowledgement Letter
Community-wide Assessment
Hazardous Substances and Petroleum
City of Lawrence
Marion County, Indiana

Dear Mr. Joyce:

This letter is provided in support of the City of Lawrence's (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-Wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City is applying for \$400,000 (\$200,000 for hazardous substances and \$200,000 for petroleum) to conduct environmental assessment activities for at least nine target properties in the Pike Plan Area and other sites in the updated inventory, prioritized by redevelopment potential, threats to human health and the environment, environmental justice, and community input, with mixed commercial/industrial, residential and recreational redevelopment goals.

IDEM believes that that City of Lawrence has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and/or technical assistance offered by U.S. EPA and the Indiana Brownfields Program in the past (e.g., Lawrence Village Senior Residence, Precision Machine Company). This assessment grant funding will help the City continue its effort to assess brownfields in the community. Should an opportunity arise for the City to pursue cleanup/closure assistance at any of the sites investigated with this grant funding, the City will participate in the Indiana Brownfields Program or the IDEM Voluntary Remediation Program as necessary.

Based on the information submitted, IDEM considers the City of Lawrence a good candidate to receive U.S. EPA grant funding to continue its brownfield



U.S. EPA Brownfields Grant Proposal
IDEM Acknowledgement Letter
December 19, 2014
Page 2 of 2

redevelopment efforts, which support Indiana's brownfield initiative. IDEM is pleased to assist and looks forward to continuing its partnership with the City of Lawrence. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program toll free at (800) 451-6027, ext. 4-0235, or directly at (317) 234-0235 or at moertel@ifa.in.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Oertel", written in a cursive style.

Bruce A. Oertel, Chief
Remediation Services Branch
Office of Land Quality

BAO/mmo

cc: (via electronic transmission)
Joel Markland, BCA

ATTACHMENT III)

Letters of Support from Partners, County Health Department, and WorkOne

38th & Shadeland Community Improvement Association
3503 N. Shadeland Ave.
Indianapolis, IN 46140

Dec. 12, 2014

The Honorable Dean Jessup, Mayor
City of Lawrence
9001 E. 59th St.
Lawrence, IN 46216

Dear Mayor Jessup:

The 38th & Shadeland Community Improvement Association is pleased to support the city of Lawrence's application for a U.S. EPA Brownfield Assessment Grant. When the grant is obtained we will do everything possible to assist the city of Lawrence to identify, investigate and redevelop properties in the part of our service area that lies within the city.

38th & Shadeland Community Improvement Association has, for more than 30 years, worked for the revitalization of its service area of 46th Street on the north, Arlington Avenue on the west, Interstate 465 on the east and Interstate 70 on the south. During those 30 years, we have served as a beacon to eliminate blight and urban decay and to encourage positive economic development.

The association will do everything in its power to provide support during the EPA grant program to develop an inventory of brownfield sites. Together we can make a difference in northeast Marion County.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Thomas A. Crouch". The signature is fluid and cursive, with the first name "Thomas" being more prominent.

Thomas A. Crouch
Land Use Chairman

Dec. 11, 2014

The Honorable Dean Jessup, Mayor
City of Lawrence
9001 E. 59th St.
Lawrence, IN 46216



Dear Mayor Jessup:

The Community Alliance of the Far Eastside Inc. is delighted to support the city of Lawrence's application for a U.S. EPA Brownfield Assessment Grant. We are advocates for the broader community, rallying citizens to make the Far Eastside a better place for all. We strive to strengthen our neighborhoods by helping low- and moderate-income homeowners with repairs and we refurbish and sell houses to first-time homeowners. Brownfield redevelopment is another tool we can use to serve our members and build an even better business climate in Lawrence.

The award of this grant will significantly aid our residential and business community in addressing decades-old brownfield issues and thereby greatly improve the marketability and economic strength of the city of Lawrence. The city's brownfield initiative and redevelopment plan have great potential for job creation, business investment and increased property values.

In the spirit of partnership and commitment to this process, CAFÉ will assist the city by organizing neighborhood meetings and assist with public outreach. Second, we will actively hold committee positions and/or board memberships to circulate information about public meetings and the grant process via our website and other means.

We are committed to improving the quality of life for the citizens of Lawrence by doing our part to facilitate the economic development and redevelopment of the area. We remain ever mindful of the strategic initiatives necessary to build a dynamic, thriving community today and into the future and how brownfield redevelopment plays a key role in the success of these efforts. Continued brownfield redevelopment through the USEPA Assessment Grant program will enable our local neighborhoods to grow, prosper and permanently erase the environmental elements that have stifled growth in our area for decades.

We thoroughly support Lawrence's efforts and are committed to be an active partner in the brownfields redevelopment work. We look forward to working with the city throughout this project to enhance the future of this great community.

Sincerely,

Melissa K. Drew
Executive Director



Lawrence CDC

community development corporation

4437 North Franklin Road

Lawrence, IN 46226

317-542-0146

December 11, 2014

Mayor Dean Jessup
City of Lawrence
9001 E. 59th St. Suite 301
Lawrence, IN. 46216

Dear Mayor Jessup:

The Lawrence Community Development Corporation (Lawrence CDC) is pleased to support the City of Lawrence's application for a U.S. EPA Brownfield Assessment Grant. We are committed to a partnership with the local community to identify and redevelop brownfield properties by providing assistance with identifying sites where investigations may be needed, and marketing properties that have been investigated.

Lawrence CDC's mission is to combat decay and deterioration, to preserve and beautify, to stimulate improvement and revitalization, and to stimulate and effect development and redevelopment in the City of Lawrence. We serve as a positive community focus for all residents, businesses, and community organizations in the City of Lawrence and the former Fort Harrison, and assist in the promotion and implementation of economic development and redevelopment.

Lawrence CDC is a catalyst for improving quality of life for residents of our City through community participation and collaborative partnerships. Residents and business owners play an integral part in planning and developing our ideal community. We believe that neighborhood improvement is a constant process and that the City of Lawrence's grant application can provide significant assistance.

Lawrence CDC's role during the EPA grant program will be to provide support and expertise in developing an inventory of brownfield priorities. We will serve on committees and boards, as requested, and we will provide outreach services by publicizing information about public meetings and the grant process.

We are excited about the opportunity this will bring to the community, and look forward to watching this grant stimulate growth.

Sincerely yours,

Christopher S. Barnett
Executive Director



December 16, 2014

Mayor Dean Jessup
City of Lawrence
9001 E. 59th Street, Suite 301
Lawrence, IN 46216

Dear Mayor Jessup:

Greater Indy Habitat for Humanity is happy to offer assistance to the Brownfield redevelopment efforts of the City of Lawrence. We have constructed several homes in the City's target areas where the greatest need for redevelopment funding is located and want to continue our involvement as commercial and industrial properties are assessed for cleanup and redevelopment.

Partnership is important to us. We have established robust partnerships with local government, churches, businesses and individuals across the county. Our goal is to build a greater county-wide awareness of the issues associated with sub-standard housing.

Habitat for Humanity has a strong presence in low-income areas of the communities we serve. Because of that, we have a unique opportunity to make sure that those community members can make their voices heard as their neighborhoods undergo assessment activities. If residents have concerns about unsafe buildings or environmental contamination affecting them or their loved ones, we can pass that information on to the City. Finally, we will continue to pursue opportunities to complete projects in Lawrence. As stated above, these areas are already a high priority to us, and they will continue to be so.

The EPA Brownfields Assessment Grant will be a blessing to our community and the entire Central Indiana region. We are pleased to be able to support the City in this initiative.

A handwritten signature in black ink, appearing to read "Jim Morris". The signature is fluid and cursive, with a large initial "J" and "M".

Jim Morris
President & CEO



December 11, 2014

Mayor Dean Jessup
City of Lawrence
9001 E. 59th St. Suite 301
Lawrence, IN 46216

Dear Mayor Jessup:

The Fort Harrison Reuse Authority (FHRA) is excited to support the City of Lawrence's application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of Lawrence by facilitating the economic redevelopment of the former Fort Benjamin Harrison Army Base.

The FHRA's goal is to attract new companies/organizations and residents to the Fort Benjamin area and redevelop and/or revitalize the former Fort Benjamin Harrison base. We serve as a positive community focus for all residents, businesses, and community organizations in the City of Lawrence and the former Fort Harrison for the promotion and implementation of economic development and redevelopment in the area.

The FHRA will assist the City by providing the support in developing inventory priorities and will as key members on committees and boards. Finally, we will provide outreach services by circulating information about public meetings and the grant process via our website and other forms of media.

We remain ever mindful of the strategic initiatives necessary to build a dynamic, thriving community today and into the future, and how brownfield redevelopment plays a key role in the success of these efforts. Continued brownfield redevelopment through the USEPA Assessment Grant program will enable our business and neighborhood partners to grow, prosper, and permanently erase the environmental elements that have stifled prosperity in our area for decades.

We look forward to working with the City of Lawrence throughout this project to enhance the future of this great community.

Sincerely,

Freddie E. Burrus
Executive Director

Dec. 12, 2014

The Honorable Dean Jessup, Mayor
City of Lawrence
9001 E. 59th St.
Lawrence, IN 46216

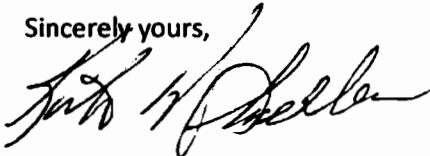
Dear Mayor Jessup:

The Friends of Fort Harrison State Park are pleased to support the city of Lawrence's application for a U.S. EPA Brownfield Assessment Grant. We share a common concern about enhancing and protecting the environment. We also are vitally concerned about the economic vitality of our neighbors.

The Friends of Fort Harrison State Park is a 501 (c) 3 organization created to support Fort Harrison State Park and the Lawrence community to eliminate environmental blight and urban decay and to encourage positive economic development.

The Friends of Fort Harrison State Park will do everything in our power to provide support during the EPA grant program. Together we can make Lawrence an icon of environmental cleanliness and economic activity.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kirk Wheeler", written over the typed name.

Kirk Wheeler
President of the Friends of Fort Harrison State Park



Prevent. Promote. Protect.

3838 North Rural Street Indianapolis, IN 46205 317-221-2000

www.mchd.com

December 18, 2014

Mayor Dean Jessup
City of Lawrence
9001 E. 59th Street, Suite 301
Lawrence, IN 46216

RE: U.S. EPA Community Wide Brownfields Assessment Grant Application

Dear Mayor Jessup:

The Marion County Public Health Department is pleased to express its support for the City of Lawrence's pursuit of the U.S. EPA Brownfields Assessment grant.

The Marion County Public Health Department (MCPHD) is dedicated to the health of the residents in the City of Lawrence (Lawrence) and all of Marion County. We are proud to become a partner in Lawrence's initiative to address brownfields. These potentially contaminated properties and old industrial sites are primarily located in Lawrence's low-income residential areas. These are the areas that are disproportionately affected by environmental issues and their populations are often the beneficiaries of MCPHD's public health services.

MCPHD hopes that the brownfields program will revitalize properties that need it the most to create measurable improvement in the health of residents living near the brownfield sites. The goals of the MCPHD and Lawrence are the same: to improve environmental health for the residents and reduce the risks to public health and the environment. We will provide assistance by tracking services provided by the Healthy Homes, Environmental Consumer Management & Senior Care Department (HHECMSC) to those residents in affected brownfield areas. Through HHECMSC, we will provide blood lead testing of at risk children ages six and younger, and pregnant women living or spending a significant amount of time in the target areas. Furthermore, through HHECMSC, we will provide medical case management for children identified with an elevated blood lead level. The City of Lawrence estimates providing assistance to approximately 150 clients over the next three years. The in kind contribution of MCPHD/HHECMSC consisting of blood lead testing and analysis, educational outreach, educational supplies, and medical case management is estimated to be approximately \$13,700 over the course of the 3 year grant. Finally, we will provide information to residents should any health concerns be discovered as a result of the brownfield investigations.

We look forward to continuing our partnership with the City of Lawrence and strongly support your application for this grant.

Sincerely,

A handwritten signature in black ink that reads "Virginia A. Caine MD". The signature is written in a cursive, flowing style.

Virginia A. Caine, MD
Director

EmployIndy

Defining Success. Driving Growth.

December 17, 2014

Mayor Dean Jessup
City of Lawrence
9001 E. 59th Street, Suite 301
Lawrence, IN 46216

Dear Mayor Jessup:

EmployIndy operates three (3) WorkOne offices around the county, ensuring effective and strategic service delivery to job seekers. EmployIndy, through WorkOne, offers an array of job readiness services to job seekers such as; resume' writing, soft skill training, job search assistance, and much more. Our WorkOne offices also work closely with Community Based Organizations through our Mobile WorkOne and our Virtual WorkOne programs to reach residents that participate in community job readiness programs. The primary objective for EmployIndy is to be recognized and sought out as the identified labor source for our region.

Revitalization opportunities in areas most affected by brownfields is an important ingredient in assisting area residents to seek full time, permanent employment. EmployIndy would be pleased to serve as a partner with the City of Lawrence to facilitate necessary training and placement services that result from brownfield redevelopment.

We look forward to lending our support and being a part of this successful effort.

Sincerely,



Brooke Huntington
President/CEO

ATTACHMENT IV)

Firm Leveraging Commitments



CITY OF LAWRENCE OFFICE OF THE MAYOR OFFICE MEMORANDUM

TO: Mayor Dean E. Jessup

FROM: Timothy Joyce

SUBJECT: Brownfields

DATE: December 19, 2014

The city of Lawrence is resolute in its efforts to address brownfields in our community. The United States Environmental Protection Agency Brownfields Assessment Grant is a critical tool to accelerate our plans to redevelop our areas of most need. Our city leadership believes that EPA grant funding will be an extraordinary benefit to city and surrounding area and would like to offer support for the project; we also are prepared to provide the necessary resources to support the grant project.

The city of Lawrence operates several Tax Increment Financing districts, including one that encompasses the area of our community most heavily targeted for EPA grant funding investment. We would use TIF funding in this area for infrastructure improvements projects such as sidewalks, water lines, sanitary sewer upgrades and roads.

Because the value of this incentive depends on the scope of the redevelopment and the qualifications of the developer, the city cannot commit an exact amount of leveraged funds. However, we are willing to commit, as appropriate, to using these programs to support redevelopment of brownfields that are assessed using the Assessment Grant funds. Specifically, the city is willing to commit up to \$250,000 in TIF funds for infrastructure improvement projects surrounding brownfield sites.

The city of Lawrence has begun investing in these target areas through other funding sources. For example, the city is completing a revitalization plan for Franklin Road (Census Tract 330700) that includes the design and development of a multi-modal street that incorporates pedestrian and biking lanes to connect Pendleton Pike to 56th Street, the location of much of the commerce in our community. We also have developed the Pendleton Pike Area Plan, which outlines the path to successful redevelopment where it is most desperately needed. This leveraging effort, followed by an infusion of brownfield assessment funding through the EPA, will be the investment needed to quickly and effectively trigger rapid redevelopment in this area of greatest need in our community.

The city of Lawrence looks forward to this opportunity and using TIF funding to support the redevelopment of brownfields in our community.

Restorical Research

uncovering history to cover your needs

Historic Comprehensive General Liability ("CGL" a.k.a. "slip & fall") policies for the purpose of paying for third party property damage as a result of environmental issues, is a means of funding for sites in Indiana, large and small. This is particularly true when you combine this "hidden asset" with EPA Brownfield's Assessment grants so that development does occur.

Restorical Research's ("RR's") unique approach is to help its clients obtain funds to deal with environmental issues by finding the above mentioned policies or evidence that they existed. Indiana courts have consistently ruled that CGL policies may afford coverage to respond to action brought by the Indiana Department of Environmental Management (IDEM) or local governments calling for the investigation and cleanup of polluted properties. Most policies, and even some issued in the last few years, fall into this category where insurance funding may be available. In most situations, the property damage limits under these policies far exceed the cost of clean-up. Nevertheless, the more policies the better and finding the primarily , secondary or tertiary evidence of CGL policies that supports claims is a skill and expertise that has evolved over 15 years. RR has performed its craft for over 300 projects, most of which are in Indiana, in 14 states.

The Senior Citizens Center in Greensburg provides a perfect illustration of RR's unique approach of working with a community and its consultant and how third-party funds can be used to leverage more dollars toward an overall assessment and redevelopment program.

The City of Greensburg received an assessment grant of \$30,000 for a Phase I and limited Phase II assessment of their vacant Senior Citizens Center, a property which had once been a service station. RR was hired to investigate the possibility of using the City's historic insurance policies to fund the cleanup of any contamination found on the property during this assessment. The Phase II confirmed the site had soil and groundwater impact and at least six underground storage tanks were also discovered.

A RR archaeologist reconstructed the City's historic general liability coverage and coverage counsel successfully negotiated with the carriers. As a result, **this project was completely funded by the insurance carriers.** The site was remediated **—at no cost to the City.** In addition, the property was sold and Mayor Frank Manus, at the time was very pleased that the once-abandoned site was sold at fair market value and redeveloped.

12730 Meetinghouse Road, Suite 200 Carmel, Indiana 46032



"Our City was saved nearly \$500,000 in remediation costs and we won't have to lower our selling price because of environmental concerns."

"What we once considered a liability has now become a very marketable asset."

- Mayor Frank Manus

This is an example of how a city utilized insurance recovery, in conjunction with a limited grant, to cleanup a site. (In this case \$30,000 leveraged \$500,000).

If you have any questions or would like additional information, feel free to contact me at your convenience.

Thank You.

David Valinetz, President CEO
Restorical Research, LLC.

ATTACHMENT V)

Other Factors Checklist (also attached to Cover Letter)

Appendix 3 Assessment Other Factors Checklist

Name of Applicant: CITY OF LAWRENCE, INDIANA

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

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